

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

FEIN, SUCH, KAHN & SHEPARD, P.C.

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WELLS FARGO BANK, NA
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In Re:

PAUL A. NEMETH

Debtor(s).

Case No.: 16-18025 MBK

Adv. No.:

Chapter: 13

Hearing Date: OCTOBER 3, 2017.

Judge: Honorable Michael B.
Kaplan

**NOTICE OF MOTION TO VACATE
AUTOMATIC STAY PURSUANT TO 11
U.S.C. 362 (d)**

TO: ARTHUR L. SKAAR, JR.
425 AMWELL RD. STE. 4
PO BOX 5878
HILLSBOROUGH, NJ 08844-5878
Debtor(s)' Attorney

ALBERT RUSSO
STANDING CHAPTER 13 TRUSTEE
CN 4853
TRENTON, NJ 08650-4853
Trustee in Bankruptcy

PAUL A. NEMETH
58 ASHLEY RD
EDISON, NJ 08817-4064
Debtor(s)

SIR and MADAM:

PLEASE TAKE NOTICE that the undersigned attorney for the Secured Creditor, WELLS FARGO BANK, NA, shall move before the United States Bankruptcy Judge, Honorable Michael B. Kaplan, 402 East State Street, TRENTON, NJ 08608 on the 3RD day of OCTOBER, 2017, at 10:00 a.m., or as soon thereafter as counsel may be heard, for the following relief:

A. For an Order to Vacate the Automatic Stay pursuant to 11 U.S.C. 362 (d) (1) and/or (2) to permit WELLS FARGO BANK, NA, to proceed against the Debtor(s) and to foreclose upon residential real property of the Debtor(s) known as 58 ASHLEY ROAD, EDISON, NJ 08817 (hereinafter "Premises"), by any lawful means in the Superior Court of New Jersey, Chancery Division; and

B. For such other relief as is just.

STATEMENT OF NON-NECESSITY OF BRIEF: The Movant certifies pursuant to D.N.J. LBR 9013-2 that the within motion involves common questions of law and fact and does not involve complex or novel issues such as to require the submission of a legal brief.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, counsel will rely upon the Affidavit of WELLS FARGO BANK, NA.

Dated: September 5, 2017

FEIN, SUCH, KAHN & SHEPARD, P.C., Attorneys for Secured Creditor WELLS FARGO BANK, NA

X /S/ JILL A. MANZO